



MURIEL GOODE-TRUFANT  
*Acting Corporation Counsel*

THE CITY OF NEW YORK  
LAW DEPARTMENT  
100 CHURCH STREET  
NEW YORK, NY 10007

Ilona J. Ehrlich  
Labor and Employment Law Division  
Telephone: (212) 356-2549  
Email: iehrlich@law.nyc.gov

June 26, 2024

**Via ECF**

Honorable Nina R. Morrison  
United States District Court  
Eastern District of New York  
225 Camden Plaza East  
Brooklyn, New York 11201

Re: Hurley v. The Department of Education of the City of New York  
24-cv-01664 (NRM) (LB)

Dear Judge Morrison:

I am an Assistant Corporation Counsel in the Office of Muriel Goode-Trufant, Acting Corporation Counsel of the City of New York, assigned to represent Defendant, Department of Education of the City of New York (“DOE”) in the above-referenced matter. I write to respectfully request an extension of time, from June 26, 2024, to August 26, 2024, for Defendant to respond to the complaint. This is Defendant’s first request for an extension of time, and the requested extension does not affect any scheduled dates. Plaintiff has consented to Defendant’s request for a 60-day extension.

The complaint in this matter contains numerous allegations of discrimination against the DOE. Additional time is needed to collect and review documents in order to appropriately respond to the complaint, and to speak with potential witnesses concerning the allegations.

We thank the Court for its consideration of this request.

Respectfully submitted,

/s/ Ilona Ehrlich  
Ilona J. Ehrlich  
Assistant Corporation Counsel

Cc: Maureen Hurley, *Pro Se* Plaintiff (By ECF)  
By USPS to:  
18 Kisco Park Drive  
Mount Kisco, NY 10549